

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE: ETHICON INC. PELVIC REPAIR) MDL Docket No. 2327
SYSTEM PRODUCTS LIABILITY) HONORABLE JUDGE JOSEPH R.
LITIGATION) GOODWIN

UNOPPOSED MOTION FOR APPOINTING HON. GLENN A. NORTON (RET.) AS
SPECIAL MASTER FOR PRIVATE SETLLEMENT AGREEMENT BETWEEN
ETHICON AND CERTAIN PLAINTIFFS' COUNSEL

Cellino & Barnes P.C., as counsel for certain plaintiffs in this MDL 2327, hereby moves the Court for entry of an Order to appoint Hon. Glenn A. Norton (Ret.) (hereinafter "Judge Norton") as Special Master to perform certain defined functions related to the administration and implementation of the Confidential Master Settlement Agreement as agreed by Plaintiffs' Counsel and Ethicon.

Judge Norton was appointed to the Missouri Bar in 1985 and is currently in good standing. In 2002 Judge Norton was appointed to the Missouri Court of Appeals for the Eastern District where he served as Chief Judge from 2005 to 2006, and as the Settlement Judge from 2010 to 2015. Judge Norton has a Mediation Certification from the University of Missouri and since 2015 has acted as Special Master in thousands of mass tort cases including but not limited to Round-Up, Medtronic Infuse, Fresenius Granuflo, Talc, and GM Ignition Interlock. An affidavit prepared by Judge Norton and his curriculum vitae are attached hereto as **Exhibit A** and **Exhibit B**, respectively.

Specifically as agreed by the parties, Judge Norton, as the Special Master for the administration of the confidential settlement, will perform certain duties of the Special Master, in furtherance of the fair and efficient administration and implementation of the settlements. This

Motion also seeks permission for the Special Master to have *ex parte* communications with the parties to the Settlement Agreement, i.e., Plaintiffs' Counsel and their clients, Ethicon and its counsel, or the Court, and such *ex parte* communications shall not be deemed to have waived any attorney-client privileges.

For the reasons stated above, Cellino & Barnes P.C. respectfully requests that the Court appoint Hon. Glenn A. Norton (Ret.) as Special Master for the private settlement agreement between Cellino and Barnes P.C. and enter an Order in the form submitted herewith.

DATED: May 21, 2018

CELLINO & BARNES P.C.

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